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ATTORNEY FOR DEFENDANT

Lincoln Educational Services

Corporation

1898-109344 (MJB/AAK)

John Gaviria, Individually and on behalf of a
Class of others similarly situated,

vs.

Lincoln Education Services Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DOCKET NO. 2:20-cv-18552

CIVIL ACTION

**NOTICE OF MOTION FOR LEAVE
TO FILE A LATE REPLY**

PLEASE TAKE NOTICE that on August 12, 2021, at 9:00 o'clock in the forenoon the undersigned counsel for Defendant, Lincoln Educational Services Corporation, shall move before the United States District Court for the District of New Jersey for an Order granting leave to file a late Reply Brief in response to Plaintiff's Opposition to Defendant's Motion for Reconsideration in the form attached hereto. In support thereof, Defendant shall rely upon the Brief and Proposed Order submitted herewith.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

/s/ Amanda A. King

Amanda A. King, Esquire

Attorney for Defendant,

Lincoln Educational Services Corporation

Date: August 12, 2021